



24 February 2016

Coastal Reforms Team
Office of Environment and Heritage

[REDACTED]
SYDNEY SOUTH NSW 1232

Email: [REDACTED]

Dear Sir/Madam

Re: Surf Life Saving NSW submission on the NSW Draft Government Bill - Coastal Management Bill 2015

Surf Life Saving NSW (SLSNSW) would like to thank the NSW Government for opening up the coastal management reforms package for public consultation and giving us the opportunity to provide feedback.

Introduction

Surf Life Saving NSW (SLSNSW) is the peak water safety, drowning prevention and rescue organisation in NSW with over 100 years of history. SLSNSW represents 129 Surf Life Saving Clubs (SLSCs), 11 Branches and 77,000 members. Last season our lifesavers watched over 7.1 million people who visited NSW beaches. Our lifesavers carried out 5,902 rescues, 138,775 preventative actions and 9,199 first aid cases.

Our 129 SLSCs are greatly impacted by Government policy decisions relating to the management of the coastline due to their positioning along the coastline of NSW and also through the provision of lifesaving services.

Our SLSCs provide lifesaving services and patrols to the community on beaches and therefore have the potential to be greatly affected by any legislative changes surrounding coastal management that impact upon public safety at the beach. Along with the provision of lifesaving services, Surf Life Saving clubhouses provide facilities for lifesaving and training purposes, as well as storing vital lifesaving equipment in close proximity to patrols. Many clubhouses also provide an elevated patrolling position close to the water which provides a significant advantage in supervising swimming and beach areas.

Many club houses were built in the early part of last century, some wholly by volunteers and which have subsequently been extended over the years into their current form. There are a number of club houses in NSW situated within close proximity to the ocean, some of which have been gazetted in Coastal Protection Zones under the *Coastal Protection Regulation 2011*.

SLSNSW advocate for the security and longevity of the club houses in NSW so that SLSCs can continue to provide services to the public with minimal impediment. SLSNSW recommends that SLSCs are considered and protected as much as possible in any relevant legislative changes to ensure their future viability.

Public Consultation draft – NSW Draft Government Bill – Coastal Management Bill 2015

SLSNSW urges the NSW Government to consider coastal safety measures upfront as part of any coastal planning to ensure that risks to the public are effectively managed in the planning stages of the development, rather than retrospectively addressing issues or responding to incidents of coastal injury or death that may have been preventable. Identifying and mitigating coastal safety risks in the planning stage may also shift the burden of mitigating risks to the developer and away from the rate payer.

SLSNSW has received funding through the NSW Government's Water Safety Black Spots Fund to conduct a state-wide coastal public safety risk assessment known as 'Project Blueprint' which involves assessing every beach and rock platform in NSW with the ultimate aim of reducing drowning. SLSNSW is currently in the fourth year of this Project and this assessment process examines a range of factors which can impact on risk, including signage and beach access, and lifesaving/lifeguard services. Following the assessment process, reports are provided to Land Managers with information such as the Australian Beach Safety and Management Program (ASAMP) beach hazard ratings, visitation levels, incident history and identification of hazards.

'Project Blueprint' has identified a consistent need for development in coastal areas to consider the impact of increased coastal usage, discussing possible treatment options such as education, signage, access, public rescue equipment and supervision as part of the planning process.

In order to mitigate risks to the general public when accessing coastal areas, SLSNSW proposes the following recommendations on the Public Consultation Draft.

1. Amend the Objects of the Act and the objects of the "Coastal use area" to include the "establishment and promotion of coastal safety".
 - Amend section 3 to include the "establishment and promotion of coastal safety" (page 4).
 - Amend section 9 (2) to include the "establishment and promotion of coastal safety" (page 8).
2. Expand the consultation process required by local council when adopting a Coastal Management Plan to include any affected SLSC or Lifeguard Service.
 - Amend section 16 (1) to include "Any affected SLSC or lifeguard service" (page 11).
3. Include information in the Coastal Management Manual regarding coastal safety considerations.
 - Amend section 21 (3) to include "information on the establishment and promotion of coastal safety" (page 13).
4. Include at least one member in the NSW Coastal Council who holds expertise in the area of "coastal safety".
 - Amend section 24 (3) to include "coastal safety" (page 15).

SLSNSW would value the opportunity to provide input to the NSW Coastal Council (Part 4) and in further consultations relating to the coastal vulnerability/environment and use area in the interests of promoting coastal safety. Given the significant amount of data we have obtained through 'Project Blueprint' and the expertise we have developed through this project and through our Coastsafe unit, we are in an ideal position to provide information and guidance to the Minister and your Office with valuable advice on matters of public safety.

Thank you for taking the time to consider our recommendations. Please do not hesitate to contact me if you have any queries or if SLSNSW can assist.

Yours faithfully

Phillip Vanny AM
Chief Executive Officer
Surf Life Saving New South Wales